

**EXHIBIT K**

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4  
5 UNITED STATES DISTRICT COURT  
6 WESTERN DISTRICT OF WASHINGTON AT SEATTLE  
7

8 JENNIFER DOLD, personal )  
representative of the )  
9 estate of Alexander Dold; )  
and KATHY DUNCAN, mother )  
10 of Alexander Dold, ) No. 2:20-cv-00383-RAJ  
)  
11 Plaintiffs, )  
)  
12 vs. )  
)  
13 SNOHOMISH COUNTY, a )  
political subdivision of )  
14 the State of Washington; )  
BRYSON MCGEE; and CODY )  
15 MCCOY, )  
)  
16 Defendants. )

17  
18  
19 VIDEOTAPED DEPOSITION UPON ORAL EXAMINATION OF  
20 STANLEY D. ADAMS, M.D.  
21

22 WEDNESDAY, FEBRUARY 23, 2022  
23 REMOTELY VIA ZOOM  
24 DEHUFFDEPO.COM  
25

1 different from dysrhythmia, that an arrhythmia means  
2 no heartbeat, period, and dysrhythmia means an  
3 irregular heartbeat for some reason. Is that wrong?

4 A Yes. They're synonymous terms, dysrhythmia --

5 Q They're synonymous?

6 A -- or arrhythmia. It just means that the heart  
7 really has no rhythm anymore.

8 What happens generally is the heart may go into  
9 ventricular fibrillation, where all the heart muscle  
10 cells, which normally beat in a synchronous,  
11 coordinated fashion, they all start beating to their  
12 own drummers, firing and contracting at their own  
13 rates.

14 And what that means is, the heart, which is a  
15 pump, is no longer pumping blood through the heart  
16 and getting it out to the vital organs. It's just  
17 sitting there quivering like a bag of worms and the  
18 blood no longer moves to the brain, and within, you  
19 know, a very short period, usually a couple minutes  
20 or so, there will be anoxic brain injury due to that.

21 Now, cardiac arrhythmia is a risk factor for  
22 hypertensive cardiovascular disease. So this  
23 gentleman, if he had never had this interaction with  
24 the law enforcement, he was at high risk for just a  
25 spontaneous sudden cardiac death.

1 1.5 cm.

2 If they're 1.5 cm or thicker, they're definitely  
3 abnormal, and they definitely can cause sudden  
4 cardiac death just by the virtue of electrical -- you  
5 know, it's way past, it's way deeper than the level  
6 that we want to get into the weeds, about how the  
7 electrical abnormality occurs, because you don't want  
8 to hear about, you know, QT, QT dispersion and all  
9 these other things.

10 But it's well documented, and he had a very  
11 abnormal heart that could cause sudden cardiac death  
12 on its own, and I don't agree with Sperry on that.

13 Q Thank you. No further questions.

14 THE VIDEOGRAPHER: Are there any follow-ups?

15 MR. LOBSENZ: Do you have questions, Richard?

16 MR. JOLLEY: Yes. I was reaching for the  
17 unmute. Sorry that you guys heard my exchange with  
18 my wife about feeding the dogs.

19 EXAMINATION

20 BY MR. JOLLEY:

21 Q Dr. Adams, just one or two quick questions.

22 In your examination of Mr. Dold, did you see  
23 anything on his face or head that appeared to you to  
24 be electrical burns?

25 A No. I don't remember anything like that. And I

